

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GUARANTEED RATE, INC.,)	
)	Case Number: 22 CV 2342
)	
Plaintiff,)	Judge: Sunil R. Harjani
)	
v.)	Magistrate Judge: Jeannice W. Appenteng
)	
EIRIK RORVIG and NATIONS LENDING)	
CORPORATION,)	
)	
Defendants.)	

JOINT STATUS REPORT

Plaintiff Guaranteed Rate, Inc. (“Plaintiff” or “GRI”), and Defendants Eirik Rorvig (“Rorvig”) and Nations Lending Corporation (“Nations”) (collectively, “Defendants”) (together with Plaintiff, the “Parties”), hereby state as follows for their Joint Status Report, pursuant to this Court’s June 17, 2025 Order (Dkt. 150):

1. On June 6, 2025, Plaintiff produced market share data reports pursuant to Defendants’ Request for Production Nos. 16 and 23 and the Court’s February 11, 2025 Order (“Motion to Compel Order”) (Dkt. 128).
2. On June 6, 2025, Defendants produced updated summary reports pursuant to Plaintiff’s Request for Production No. 59, the Motion to Compel Order, and questions GRI raised regarding the initial production of this data.
3. On July 10, 2025, the parties held a virtual meet-and-confer regarding GRI’s recent production, GRI’s responses to Defendants’ most recent document requests, and the scheduling of depositions. Defendants’ counsel explained why they believed Plaintiff’s production in certain respects was insufficient.

4. On July 21, 2025, GRI emailed Defendants' counsel regarding GRI's and Nations' most recent productions. Plaintiff requested that Defendants produce reports for each identified individual pursuant to Plaintiff's Request for Production No. 59, as well as confirm that Defendants have produced commission reports for all former Guaranteed Rate, Inc. employees pursuant to Request for Production No. 58. GRI also responded to the issues Defendants had raised in their July 10 conference.

5. The Parties continue to meet and confer in an effort to resolve these discovery disputes. Accordingly, they do not believe court intervention is necessary at this time.

6. Plaintiff continues to work diligently to obtain and provide the Michael Griffin affidavit referenced in the Motion to Compel Order, including reaching out to Mr. Griffin on multiple occasions to obtain his executed affidavit. Plaintiff has offered to enter into a stipulation in lieu of an affidavit.

7. Plaintiff is scheduled to conduct the depositions of Justin Sopko (July 25, 2025), John Owens (tentatively scheduled for August 8, 2025), and the Rule 30(b)(6) deposition of Nations (tentatively scheduled for August 29, 2025). Plaintiff's outstanding depositions are as follows: Greg Griffin and Doug Opdycke (third party). Plaintiff is diligently working to obtain Mr. Griffin and Mr. Opdycke's availability.

8. Defendants are scheduled to conduct the additional Rule 30(b)(6) deposition of GRI limited to Topic No. 4 and corresponding documents as ordered by the Motion to Compel Order (tentatively scheduled for August 28, 2025), and the deposition of Robert Slavin (tentatively scheduled for August 28, 2025). Defendants' outstanding depositions are as follows: an additional Rule 30(b)(6) deposition of GRI on certain topics identified by GRI in its September 10, 2024 Amended Initial Disclosures, as agreed to by the Parties (*See* Dkt. 146, ¶ 6.); Jason Chandler;

Jamie Franz; Gianna Coco (third party); and Aaron Hahn (third party). Defendants have noticed the depositions of Mr. Chandler and Mr. Franz, and have issued subpoenas for third parties Coco and Hahn. The parties are currently coordinating the availability of Mr. Chandler, Mr. Franz, and counsel.

9. The Parties do not believe there are any discovery disputes or other matters that require the Court's attention at this time.

Dated: July 22, 2025

By: /s/ Gregory P. Abrams

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Respectfully submitted,

By: /s/ J. Scott Humphrey

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CERTIFICATE OF SERVICE

The undersigned certifies that on July 22, 2025, he served a copy of the foregoing on all counsel of record via electronic case filing procedures.

/s/ J. Scott Humphrey

*One of the Attorneys for
Guaranteed Rate, Inc.*